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October 20, 2021

VIA ECF

The Honorable Robert B. Kugler
United States District Judge
USDC, District of New Jersey Mitchell
H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

The Honorable Thomas Vanaskie
Special Discovery Master
Stevens & Lee
1500 Market Street, East Tower, 18th
Floor
Philadelphia, PA 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, Case No. 1:19-md-02875-RBK-KW*

Dear Judge Kugler and Judge Vanaskie:

We write on behalf of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Prinston Pharmaceutical Inc. (“Prinston”), Huahai U.S. Inc. (“Huahai U.S.”) and Solco Healthcare US, LLC (“Solco”, and collectively with ZHP, Huahai U.S., and Prinston, “the ZHP Parties”) to respectfully request that the Court permit the ZHP Parties to file a brief reply in further support of their motion to redact and seal portions of the September 10 transcript (ECF No. [1584](#)).

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The ZHP Parties believe that this reply is necessary to address the ZHP Parties' need to maintain the confidentiality of their proprietary process optimization procedures, which outweighs any countervailing factors alleged by Plaintiffs in their opposition dated October 18, 2021 (ECF No. [1652](#)), and to assist the Court in its consideration of the motion to seal.

The Court has previously permitted reply briefs in support of motions to seal. *See* The ZHP Parties' Reply Supporting Their Motion to Seal dated March 8, 2021 (ECF. No. [1003](#)). Nor is the filing of a reply brief in support of a motion to seal inconsistent with Local Civil Rule 7.1(d)(3), which prohibits the filing of reply briefs unless permitted by the Court relating to only the following motions: Cross under L.Civ.R. 7.1(h); Reconsideration under L.Civ.R. 7.1(i); Case Management under L.Civ.R. 16.1(g)(2); and Discovery under L.Civ.R. 37.1(b)(3). *See* L.Civ.R. 7.1(d)(3)

We further request that the ZHP Parties be permitted to file their reply brief by no later than **November 1, 2021**. We do not believe that extending the customary deadline for reply briefs will prejudice Plaintiffs, and the submission of a reply brief will ensure a fulsome record on the issues presented.

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We thank the Court for its courtesies and consideration of this request.

Respectfully submitted,

/s/ Kelly A. Bonner

Kelly A. Bonner